

**NEXUS BANKRUPTCY**  
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Attorney for Defendant

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**RIVERSIDE DIVISION**

In re:

MICHAEL PAUL NEWMAN,  
Debtor.

CHLOE TAEKYEONG LEE,  
Plaintiff,

v.

MICHAEL PAUL NEWMAN,  
Defendant.

Case No.: 6:21-bk-11329-SC

Chapter 7

Adv. No.: 6:21-ap-01071-SC

**AMENDED  
JOINT EXHIBIT LIST**

Trial

Date: October 30, 2023

Time: 9:30 AM

Courtroom: 5C

Location: 411 West Fourth Street  
Santa Ana, CA 92701

Plaintiff, Chloe Taekyeong Lee, and Defendant, Michael Paul Newman, hereby  
submit the following amended list of exhibits which may be used a trial:

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
1	Accident report	<b>X</b>		
2	1/6/2015 email from Lindy Park to NEWMAN with insurance information	<b>X</b>		
3	6/15/2015 demand letter	<b>X</b>		
4	Draft of complaint, dated 9/5/2015 prepared by NEWMAN	<b>X</b>		
5	1/20/2016 email from NEWMAN to Lindy Park re: retainer	<b>X</b>		
6	1/21/2016 email from Lindy Park to Allen Kim re: putting 15% in NEWMAN's retainer agreement	<b>X</b>		
7	1/21/2016 letter from NEWMAN to insurance adjuster with retainer agreement	<b>X</b>		
8	1/26/2016 letter from Lyons to Ponce	<b>X</b>		
9	2/23/2016 email from insurance adjustor re: settlement acceptance	<b>X</b>		
10	2/26/2016 email chain with draft of agreement between LEE and Arms Logistics	<b>X</b>		
11	5% retainer agreement between NEWMAN and LEE	<b>X</b>		
12	15% retainter agreement between NEWMAN and LEE	<b>X</b>		
13	Draft One of agreements between LEE and Arms Logistics prepared by NEWMAN	<b>X</b>		
14	Draft Two of agreements between LEE and Arms Logistics prepared by NEWMAN	<b>X</b>		
15	3/16/2016 release of claims	<b>X</b>		
16	3/16/2016 agreement between LEE and Arms Logistics	<b>X</b>		

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
17	3/28/2016 summary of expenses to be paid	<b>X</b>		
18	7/11/2019 email from Hudrlik to NEWMAN	<b>X</b>		
19	8/2/2016 NEWMAN's letter to LEE terminating representation (with attachments)	<b>X</b>		
20	8/2/2016 email from LEE to NEWMAN re: fees	<b>X</b>		
21	8/23/2016 letter from NEWMAN to LEE with refund from Collection Consultants	<b>X</b>		
22	NEWMAN's bank statement reflecting payment of \$150,000 to NEWMAN from LEE's settlement funds	<b>X</b>		
23	Insurance company notes from 2015	<b>X</b>		
24	Insurance company notes from 2016	<b>X</b>		
25	OMITTED			
26	Summary of payments to NEWMAN by Caravan Canopy	<b>X</b>		
27	Explanation charges, final bill, and lien forms provided to NEWMAN by Collection Consultants and Providence	<b>X</b>		
28	5/19/2016 letter from NEWMAN to Providence re: reduction of bills	<b>X</b>		
29	5/31/2016 letter from Providence to NEWMAN re: discount	<b>X</b>		
30	5/31/2016 letter from NEWMAN to Providence with checks enclosed	<b>X</b>		
31	7/29/2016 letter from NEWMAN to Collection Consultants/Providence re: amount billed	<b>X</b>		
32	8/18/2016 letter from Collection Consultations to NEWMAN with a refund check	<b>X</b>		

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
33	4/7/2016 fax from NEWMAN to Collection Wizards requesting itemized final bill	<b>X</b>		
34	4/7/2016 response letter from Collection Wizards to NEWMAN	<b>X</b>		
35	3/28/2016 notice of lien sent to NEWMAN by Rawlings Company with forms and claim information	<b>X</b>		
36	4/5/2016 letter from Rawlings to NEWMAN with summary of paid claims	<b>X</b>		
37	4/27/2017 letter from NEWMAN to Rawlings Company re: reduction of bill	<b>X</b>		
38	4/29/2016 letter from NEWMAN to Rawlings Company accepting discount	<b>X</b>		
39	NEWMAN's responses to special interrogatories dated 12/15/2017	<b>X</b>		
40	OMITTED			
41	Letter from State Bar	<b>X</b>		
42	Settlement Accounting	<b>X</b>		
43	E-mail dated 02/26/2016 from Lindy Park	<b>X</b>		
44	OMITTED			
45	OMITTED			
46	OMITTED			
47	OMITTED			
48	OMITTED			
49	OMITTED			
50	OMITTED			
51	OMITTED			
52	OMITTED			
53	OMITTED			

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
54	OMITTED			
55	OMITTED			
56	Check #1002 from US Bank account #2449	<b>X</b>		
57	ARM's Accounting of \$130,000	<b>X</b>		
58	OMITTED			
59	Lee's Bank Statement from 08/19/2016 to 09/16/2016	<b>X</b>		
60	OMITTED			
61	OMITTED			
62	Newman's Lease Application dated 4/12/2016	<b>X</b>		
<b>STATE COURT ACTION</b>				
63	State Court Complaint	<b>X</b>		
64	Transcript of State Court Trial: Volume One	<b>X</b>		
65	Transcript of State Court Trial: Volume Two	<b>X</b>		
66	Transcript of State Court Trial: Volume Three	<b>X</b>		
67	State Court judgment and findings of fact	<b>X</b>		
68	California Court of Appeals Decision	<b>X</b>		
69	California Supreme Court Decision on Appeal	<b>X</b>		
<b>STATE BAR ACTION</b>				
70	State Bar notice of disciplinary charges	<b>X</b>		
71	NEWMAN's response to State Bar's disciplinary charges	<b>X</b>		
72	NEWMAN's response to State Bar's disciplinary charges	<b>X</b>		
73	State Bar's Pre-Trial Statement	<b>X</b>		

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
74	State Bar and NEWMAN's stipulation as to facts and admission of documents	<b>X</b>		
75	NEWMAN's closing brief in State Bar action	<b>X</b>		
76	State Bar Trial Transcript: Volume One	<b>X</b>		
77	State Bar Trial Transcript: Volume Two	<b>X</b>		
78	State Bar Trial Transcript: Volume Three	<b>X</b>		
79	State Bar's Decision	<b>X</b>		

The Parties stipulate to the authenticity of the Transcripts (Exs. 64, 65, 66, 76, 77, 78) but reserve the right to object to the admissibility of any testimony therein.


**NEXUS BANKRUPTCY**

Date: October 26, 2023

  
BENJAMIN HESTON,  
Attorney for Plaintiff

**LAW OFFICE OF DONALD REID**

Date: October 26, 2023

  
DONALD REID,  
Attorney for Defendant

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**100 Bayview Circle, Suite 100  
Newport Beach, CA 92660**

A true and correct copy of the foregoing document entitled (*specify*): **AMENDED JOINT EXHIBIT LIST** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 10/26/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Suzanne C Grandt    [suzanne.grandt@calbar.ca.gov](mailto:suzanne.grandt@calbar.ca.gov), [joan.randolph@calbar.ca.gov](mailto:joan.randolph@calbar.ca.gov)  
Howard B Grobstein (TR)    [hbgtrustee@gtllp.com](mailto:hbgtrustee@gtllp.com), [C135@ecfcbis.com](mailto:C135@ecfcbis.com)  
Donald W Reid    [don@donreidlaw.com](mailto:don@donreidlaw.com), [5969661420@filings.docketbird.com](mailto:5969661420@filings.docketbird.com)  
United States Trustee (RS)    [ustpreion16.rs.ecf@usdoj.gov](mailto:ustpreion16.rs.ecf@usdoj.gov)

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) 10/26/2023 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Scott C. Clarkson  
411 West Fourth Street, Suite 5130  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed (state method for each person or entity served):

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/26/2023  
Date

Benjamin Heston  
Printed Name

/s/Benjamin Heston  
Signature